Office:

UILC: 6240.00-00

From:

Sent: Monday, February 02, 2009 9:31:16 AM

To: Cc:

Subject: RE: ELP Tier

Per 6255(d), since there are no current regulations, our first choice might be to collect the tax from any remaining assets of the partnership if any still exist at the time the partnership items are finally determined. If there are no such assets, we would have no choice but to flow the adjustments through to the ELP's partners.